



October 30, 2024

Via ECF

Hon. Justin T. Quinn, U.S.M.J.
District of New Jersey
402 E State Street
Trenton, New Jersey 08609

**Re: *1735 Jersey Ave LLC v. Luxe Living Design, LLC*
Case No. 3:24-cv-06175**

***1735 Jersey Ave LLC v. Luxe Living Design, LLC et al.*
Case No. 3:24-cv-06168**

Dear Judge Quinn,

I am an attorney with the law firm of Twersky PLLC, counsel for Defendant Luxe Living Design, LLC (“Defendant” or “Tenant”) in the captioned matter. I respectfully submit this letter to update the Court pursuant to Your Honor’s directives given in the Text Order dated October 28, 2024, regarding the \$350,000 bond ordered to be posted in this matter.

As Your Honor is aware, Defendant had previously been in contact with a bond insurance agency and had submitted many documents for review. However, due to the large amount of the bond, it has taken longer for Defendant to obtain the bond than initially contemplated. Because of the difficulty Defendant was having with the first company, Defendant has also submitted an application and related financial documents to a second bond insurance agency. The two bond companies – Pederson & Sons Surety and Chein Insurance – have now contacted numerous bond underwriters on behalf of Defendant. Those bond underwriters include SurTec Insurance Company, Travelers Insurance, Intact Specialty Solutions, and Skyward Specialty Insurance. Defendant has submitted all the necessary documentation and is waiting to hear back from the various underwriters.

Accordingly, Defendant respectfully requests an extension of time to post the bond, to Wednesday, November 6, 2024. If Defendant obtains the bond before this date, Defendant will file it upon receipt. If Defendant is unable to get the necessary approval for the bond even with the granting of additional time, as an alternative, Defendant respectfully requests a cash alternative of \$175,000 to be deposited with the Court. Defendant also requests that the terms of the TRO be extended until either the posting of the bond or the cash alternative with the Court.

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Thank you in advance for Your Honor's understanding.

Respectfully yours,



Aaron Twersky, Esq.

cc: All Counsel (via ECF)